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*Attorneys for Defendant Matthews
International Corporation*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TESLA, INC.

Plaintiff,

v.

MATTHEWS INTERNATIONAL
CORPORATION

Defendant.

Case No. 24-cv-03615-EJD

**DECLARATION OF RYAN K.
WALSH IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO CONSIDER
WHETHER CASES SHOULD BE
RELATED**

1 I, Ryan K. Walsh, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the state of Georgia. I have been
3 allowed to appear *pro hac vice* in this action. I am a partner at Jones Day, attorneys of record for
4 Defendant Matthews International Corporation (“Matthews”) in this action. I have personal
5 knowledge of the facts set forth herein and, if called upon as a witness, I could and would testify to
6 such facts under oath.

7 2. I submit this Declaration in support of Matthews’ Administrative Motion to
8 Consider Whether Cases Should Be Related (“Motion”). I have reviewed this Motion.

9 3. In the Motion, Matthews explains why *Tesla, Inc. v. Matthews International*
10 *Corporation*, Case No. 25-cv-01533-SVK and *Tesla, Inc. v. Matthews International Corporation*,
11 Case No. 24-cv-03615-EJD meet the definition of “related cases” under Civil Local Rule 3-12(a).

12 4. As contemplated by Civil Local Rule 7-11, Matthews attempted to determine the
13 position of the other parties to the foregoing cases regarding whether the cases are related.

14 5. I spoke with counsel for Tesla, Inc. (“Tesla”) on the phone on February 14, 2025
15 regarding this Motion. After that telephone conversation, counsel for Tesla requested a follow-up
16 conference regarding this Motion, which was held over Microsoft Teams on February 18, 2025.
17 Counsel for Tesla did not agree that the above-referenced actions met the definition of “related
18 cases” under Civil Local Rule 3-12(a).

19 6. For the foregoing reasons, Matthews was not able to obtain a stipulation to
20 accompany the Motion.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct.

23 Dated: March 13, 2025

JONES DAY

24
25 By: /s/ Ryan K. Walsh
26 Ryan K. Walsh

27 *Attorney for Defendant Matthews*
28 *International Corporation*

1 Pursuant to Local Rule 5-1, the below filer attests that concurrence in the filing of this
2 document has been obtained from the above Signatory.

3
4 By: /s/ David C. Kiernan
David C. Kiernan
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